CALIFORNIA DEPARTMENT OF SOCIAL SERVICES
COMMUNITY CARE LICENSING
ADULT AND SENIOR CARE PROGRAM
SENIOR CARE INSPECTION TOOL PILOT PLAN

INTRODUCTION

As part of the Community Care Licensing Division's (CCLD) vision to better assure the health and safety of each resident living in licensed settings through prevention, enforcement, and compliance, CCLD will develop new inspection tools. These tools will enhance the consistency and thoroughness of inspections throughout the state and across licensing categories. The following tools are being developed in partnership with Licensing Program Analysts (LPA) and stakeholders for Residential Facilities for the Elderly (RCFE):

Pre-Licensing [1]   used for inspections conducted prior to licensure to ensure the facility meets licensing requirements

Comprehensive   used for inspections conducted within 90 days after a facility accepts its first resident following initial licensure and for inspections conducted on an annual basis

Specialty   used with comprehensive annual and post-licensing inspections when a problem area is identified

The "Domain Focused Tools," as outlined in the vision document released in September of 2017, are now called "Standard Tools." This change in nomenclature will eliminate any confusion with the specialty tools for each domain. Standard tools will be developed based upon data collected during the pilot and statewide deployment of the comprehensive tools.

This plan provides a framework for piloting the newly-developed comprehensive and specialty inspection tools for RCFEs. The lessons learned from this pilot will inform the development of similar tools in other licensing categories.

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[1] The Pre-Licensing tool is a comprehensive tool that contains requirements in all domain areas relevant to that type of visit.

PILOT PURPOSE AND GOALS

The pilot implements the comprehensive and specialty inspection tools on a small controlled scale to allow for its full impact, benefits and weaknesses to be evaluated before implementation on a statewide basis.

The comprehensive inspection tool pilot is driven by the following objectives:

- To test process measures when using comprehensive tools for consistency and thoroughness of inspections, while using the data to fine tune the tools.
- To provide Licensing Program Analysts (LPAs) with the opportunity to provide feedback on the tools, while identifying potential areas for training.
- To evaluate the proper usage of the inspection domains, including the appropriate placement of regulations and statutes within each tool.
- To identify clear and consistent expectations for licensees.
- To work with licensees in identifying and addressing potential challenges specific to the implementation of tools.
- To collaborate with stakeholders in ensuring the tools adequately assess the performance of facilities as it directly relates to the experiences of the residents in care.
- To establish and ensure technical and operational inspection guidelines are fit for purpose.
- To evaluate the revised file review checklists and handouts to the licensees.

STAKEHOLDER COMMUNICATION PLAN

The following table describes major milestones, target completion dates and how information will be relayed to licensees. These dates may change depending on the stakeholder feedback. CCLD intends to communicate broadly any changes to this timeline.

Target Completion Date	Milestone
March 2018	Release pilot information and draft tools for stakeholder review
June 2018	Train LPAs participating in the pilot
July 2018	Conduct pilot visits and licensee surveys
September 2018	Pilot period concludes
October 2018	Conduct focus groups with LPAs
December 2018	Present and publish pilot report to stakeholders
January 2019	Integrate feedback into tools

METHODOLOGY

The pilot is designed to test process measures of the inspection tools such as the:

- Duration of the inspection
- Alignment with sequence of inspections (flow)
- Ease of use and learnability of the tools

The pilot will, to a lesser degree, measure the validity and reliability of the tools by examining the:

- The number of deficiencies identified in the pilot compared to the average number of deficiencies for that facility type in the last year
- Inter-rater reliability (agreement between LPAs)
- LPA and licensee feedback regarding duplicative requirements and key requirements not covered

SAMPLING STRATEGY

The sampling strategy includes the following:

Number of LPAs	Required Experience
A minimum of 10% or a minimum of two LPAs from each regional office (RO)	For each RO, at least: - one new LPA (two years of experience or less as an LPA) and - one seasoned LPA (five years of experience or more as an LPA)

Tool Type	Sample Size
Pre-Licensing	Two inspections from each RO
Comprehensive	Eight inspections per LPA
Specialty	Two inspections per tool

The target number of LPAs and inspections may be modified based on the availability of field staff and experience/feedback from pilot submissions.

PILOT PERIOD

The pilot is expected to remain open for three months beginning on July 1st, 2018 with an anticipated completion date of September 30, 2018. The completion date may be modified based on the availability of field staff and experience/feedback from pilot submissions.

ENSURING VALIDITY AND RELIABILITY

Facilities shall be chosen from those due for an inspection to represent the array of RCFE facilities e.g. large, small etc. Each inspection visit will be completed using a comprehensive tool. Each visit shall be unannounced and will count towards the required inspections for the facility. Specialty tools will be used when a Type A or two Type B violations are found in each specialty tools' domain during a comprehensive annual or post-licensing inspection.

Inter-rater reliability (agreement between LPAs) will be conducted to determine if LPAs apply the statute and regulations consistently using the new tools. This information will also help to identify additional training needs for LPAs.

DATA COLLECTION

Quantitative and qualitative data for process measures and indicators will be collected from the data system as well as through licensee surveys and focus groups conducted with the LPAs.

Once the pilot period is concluded, four LPA focus groups with five to six participants each will be conducted to collect data specific to the applicable pilot indicators. The following table provides a list of pilot indicators.

Indicator	Description
Training and Usage Support	- Was the initial training adequate and relevant? - How must we modify the training? - How many hours were needed for the LPAs to become proficient in using the tools? - Was the training material adequate?
Duration of Inspection	- How much time was spent on using the inspection tool? - What was the total duration of inspection visit?
Ease of use and learnability of tools	- How easy is it for the LPAs to use the tools? - Did the order of the requirements "flow" with the way an inspection is conducted?
Ratio of deficiencies	What was the number of deficiencies identified using the tool compared to the average number of deficiencies for that facility type in the last year?
Comprehensiveness	- Were there any duplicative items on the tool? - Were there any items that should be included? - Were requirements in the appropriate domain?
Reliability	Was there high agreement between LPAs in applying the requirements in the instruments?
User Attitudes	- Did LPAs feel the new tool was efficient and effective? - Did the new tool help support a positive dialogue with licensees and LPAs? - Did licensees feel the new tool was efficient and effective?

Each facility that has been a part of the pilot will receive a post-inspection survey that will provide feedback regarding the use of the tools to determine similar measures from the licensee perspective (e.g. time, flow of the survey, were all the important areas covered, were there areas that were duplicative, overall impression of the tool).

CCLD will compile the qualitative and quantitative data as part of a report that will be provided to stakeholders for review and input, prior to implementing any tools statewide.

ADDITIONAL INFORMATION

Additional information about the Inspection Process Project can be found at http://www.cdss.ca.gov/inforesources/Community-Care-Licensing/Inspection-Process.

Please direct comments or questions to inspectionprocess@dss.ca.gov